(760) 878-0001
FAX: (760) 878-2552

EMAIL: mail@inyowater.org
WEB: http://www.inyowater.org

P.O. Box 337
135 South Jackson Street
Independence, CA 93526

COUNTY OF INYO
WATER DEPARTMENT

January 8, 2009

TO: Inyo County Water Commission

FROM: Inyo County Water Department

SUBJECT: Staff Report and Recommendation Regarding Coso Operating Company, Hay Ranch Water Extraction and Delivery System Conditional Use Permit (CUP 2007-0003)

Introduction

The Coso Operating Company's Hay Ranch Water Extraction and Delivery System Project is a proposed extraction of groundwater from two existing wells on the Coso/Hay Ranch property in Rose Valley, and the transfer of the groundwater to the injection distribution system at the Coso geothermal area. The proposed project is to provide additional injection water to the Coso geothermal field in order to reduce the decline in reservoir productivity due to loss of geothermal fluids from power plant cooling towers. The quantity of groundwater extraction applied for is 4,839 acre-feet/year for 30 years. The project is described and analyzed in an environmental impact report consisting of two volumes. Volume I is the final environmental impact report (FEIR), and volume II is the draft environmental impact report (DEIR) (MHA, December, 2008; MHA, July, 2008).

The water use proposed in the Hay Ranch Water Extraction and Delivery System qualifies as an inter-basin transfer of groundwater within Inyo County, and therefore falls under the provisions of the Inyo County Groundwater Ordinance (Inyo County code chapter 18.77 is provided in Appendix A). The Groundwater Ordinance requires that the Water Department and Water Commission evaluate hydrological impacts and related environmental impacts, and based on that evaluation, identify mitigation measures, project conditions, monitoring, management, reporting requirements, and proposed findings. The Water Commission then shall make a recommendation to the Planning Commission regarding the evaluation and findings. This staff report is presented to assist the Water Commission in formulating its recommendation to the Planning Commission.

Hydrogeological Impacts

Groundwater extraction of 4,839 acre-feet per year is proposed from two existing wells, the Hay Ranch North Well and the Hay Ranch South Well (Table 1). A map of the North and South Hay Ranch extraction well locations is shown in Figure C2-15 in the DEIR.

Table 1. Hay Ranch Extraction Well Construction Information.

Well	Diameter	Total Depth	Screened Interval	Year Constructed
Hay Ranch South Well	16"	675'	200'-675'	1974
Hay Ranch North Well	16"	724'	120'-724'	1971

November, 2007 depth to groundwater was about 192 feet in the Hay Ranch North Well and 180 feet in the Hay Ranch South Well. Historical Groundwater level monitoring data for the North and South Hay Ranch Wells in addition to other Rose Valley wells are located in Table C2-2 on pages 2 and 3 in the back of the DEIR.

Aquifer Characterization

In November 2007, the Hay Ranch South well was pumped in a 14-day long test followed by a recovery period of 7 days. The well was pumped at a constant rate of 1,925 gallons per minute (gpm) or 4.3 cubic feet per second. Appropriate groundwater level monitoring in 11 observation wells and discharge monitoring of the pumped well were conducted before, during and after the test. Results of this test, including aquifer characterization, were documented in Appendix C of the DEIR.

Groundwater Occurrence and Flow

The groundwater table in the Rose Valley project area ranges from 140 to 240 feet below ground surface in the northern and central parts of Rose Valley to approximately 40 feet below ground surface at the northern end of the Little Lake Ranch property, near the southern end of the valley. A groundwater elevation contour map of Rose Valley, developed from depth to water measurements made in wells on November 19, 2007, is presented on Figure 3.2-4 and tabulated in Table 3.2-2 in the DEIR. Hydrographs of selected wells are provided on pages 3.2-11 through 3.2-13 in the DEIR. Groundwater generally flows from the north end of the valley to the south end, and from the Sierra range front to the central axis of the valley (See Figure 3.2-5 in the DEIR on Page 3.2-14). Groundwater enters the northern end of the valley by seepage from South Haiwee Reservoir and possibly by underflow from Owens Valley. Groundwater discharges at the southern end of the Rose Valley in Little Lake and surrounding springs, and related phreatophytic vegetation. Several springs are located along the Sierra and one is located south of South Haiwee Reservoir at the western edge of the Coso Range in the northern Rose Valley.

Groundwater Budget of Rose Valley

The groundwater model developed for the project includes a groundwater budget for Rose Valley (Final EIR, Table C2-4). Groundwater inflow to the Rose Valley is thought to be made up of two main components: mountain front recharge from the west, estimated at 4,191 acre-ft/yr, and groundwater flow from the north including seepage from South Haiwee Reservoir, estimated at 788 acre-feet per year for a total of 4,979 acre-feet per year. Recharge from precipitation on the Rose Valley floor and alluvial fans, and groundwater flow from the Coso Range may contribute to the water budget, but for the analysis in the DEIR these sources were considered negligible so as to ensure that the model did not overestimate the amount of water in the system. Groundwater outflow from the system was modeled as consisting of 5 components: 1) existing extraction wells at 40 acre-feet per year, 2) groundwater underflow out to the Indian Wells Valley at 739 acre-feet per year, 3) evaporation from Little Lake and evapotranspriation from adjacent wetland plants at 700 acre-feet per year, 4) phreatophyte plant transpiration on Little Lake Ranch property south of Little Lake at 500 acre-feet per year and 5) groundwater discharge through Little Lake Gap to Indian Wells Valley at 3,000 acre feet per year. Total discharge totals of 4,979 acre-feet per year. This most recent water budget is similar to previously estimated water budgets.

Groundwater and Surface Water Chemistry

Extensive water quality and isotope analysis has been done on groundwater and surface water in the Rose Valley (Chapter 3.2 and Appendix C3, DEIR). Hay Ranch groundwater appears to be a more concentrated version of Haiwee Reservoir water to the north. Ground and surface waters have been grouped into several types based on their chemistry and isotopic signatures. These groundwater and surface water groupings are presented on pages 3.2-21 through 3.2-23 of the DEIR. The water quality and isotopic indicate that most of the groundwater in Rose Valley originates from the Sierra Nevada, consistent with the water budget discussed above (DEIR, page 3.2-22).

Groundwater Model Development and Application

A groundwater flow model of the Rose Valley was constructed using the USGS MODFLOW groundwater modeling program. All applicable available data was used in the construction of the model and it was calibrated using the long-term pumping test described above. Features of the Rose Valley Groundwater model are discussed on pages C2-12 through C2-18 in Appendix C2 of the DEIR. After calibration, the model was used to predict groundwater drawdowns that would develop in the Rose Valley Groundwater Basin after 30 years of pumping at the full project development rate of 4,839 acre-feet per year. Figure C2-15 in Appendix C2 of the DEIR depicts the expected groundwater drawdown contours. Drawdown contours displayed in this figure range from 50 feet adjacent to the Hay Ranch wells to 10 feet in the extreme north and south of the Rose Valley Groundwater Basin.

Application of the groundwater flow model revealed that drawdowns experienced in the southern end of Rose Valley due to the pumping for the Coso project would reach a maximum at some time after pumping was concluded. Groundwater and surface water dependent resources in the southern end of Rose Valley were protected by using the groundwater flow model to propose

trigger levels in up-valley wells to prevent significant effects to southern Rose Valley water dependent resources.

Analysis of Effects on Groundwater Dependent Resources and Subsidence: Proposed Findings

An inventory of groundwater dependent resources in Rose Valley was provided in the environmental documentation for the Coso Operating Company Hay Ranch Water Extraction and Delivery System DEIR. Included in this documentation was an inventory of surface water bodies, springs, wells, groundwater and surface water water quality and biological resources.

Effects on Fish

There is a high potential for occurrence at Little Lake Ranch of Owens speckled dace (Page 3.4-19 Draft EIR). No significant effects on this fish are expected if the Mitigation Monitoring and Reporting Plan is implemented (DEIR Appendix B).

Effects on Wildlife

Wildlife was inventoried as part of the EIR process for the project and an inventory is contained on pages 3.4-5 through 3.4-23 as well as Appendix D of the DEIR. No significant effects on wildlife are expected if the Mitigation Monitoring and Reporting Plan is successfully implemented (See Appendix B to this report).

Effects on Water Levels in Wells

An inventory of groundwater users in Rose Valley is provided in the DEIR and groups of well locations and the predicted maximum drawdown is shown in Table 3.2-5 on Page 3.2-36 of the DEIR. A map showing these locations and the drawdown contours is shown on Page 3.2-35 as Figure 3.2-14. Groundwater level drawdowns in wells of other groundwater users in Rose Valley are predicted to be as much as 55 feet. These predicted drawdowns are potentially significant, since they could increase pumping costs, reduce discharge from a well, or reduce water levels below the current pump settings and potentially render a well inoperable. The project will be required to monitor groundwater levels in a network of wells that will provide an early warning system, and allow for mitigation in the form of a shortened period of pumping to avoid significant impacts. The duration of pumping will likely be shortened significantly below thirty years to avoid significant impacts.

Impacts to groundwater wells would be mitigated by in Mitigation Measure Hydrology-2 as documented in the Mitigation Monitoring and Reporting Plan in Appendix B and the DEIR. The applicant would be responsible for lowering pumps or deepening wells in Rose Valley that are impacted by groundwater withdrawal from Hay Ranch. The applicant would also bear the costs of any additional energy costs required to pump the wells that are affected. No significant effects on wells are expected if the provisions above and the Mitigation Monitoring and Reporting Plan are implemented.

Effects on Springs and Seeps

An inventory was prepared of Springs and Seeps of the Rose Valley and is presented on pages 3.2-4 through 3.2-6 and in the DEIR. Additional documentation of Rose Spring is supplied on Page 3 of the Eremico Biological Services Letter Report dated May 1, 2008 in Appendix D of the DEIR. Maps of the spring locations are shown on Pages 3.2-15 and 3.2-4 as well as 3.2-7 of the DEIR.

Two springs, Tunawee and Davis are located along the western side of the Sierra at elevations where they are likely sustained by high elevation precipitation infiltration in the Sierra to the west. These springs are not expected to be impacted by the project (DEIR, Page 3.2-41).

Rose Spring is located approximately 2 miles south and west of the South Haiwee Reservoir. It is believed that the spring is perched above the water table (DEIR, Page 3.2-41). The source for water for the spring is derived from Sierra Nevada mountain front precipitation and groundwater underflow from Owens Valley, neither of which is likely to be impacted by pumping at Hay Ranch (DEIR, Page 3.2-41). This spring has no surface discharge at present.

Two other springs, the Little Lake Fault Spring and Coso Spring are located at the south end of Rose Valley. Groundwater discharging from Coso Spring flows into Upper Little Lake Pond.

Spring discharge rates at Little Lake Ranch could be reduced because pumping at Hay Ranch may capture some of the groundwater flow from Owens Valley and the Sierran recharge that would otherwise reach the springs. The proposed project could also reduce the discharge rate of water from the lower siphon well and Coso Spring located about 0.25 miles south of the Little Lake Weir (DEIR, page 3.2-43).

Based on its location, elevation and isotope chemistry, the source of water for Little Lake Fault Spring is mainly from precipitation recharge in the Sierra and is unlikely to be impacted by the proposed project (DEIR, page C2-5).

No significant effects on springs are expected if the Mitigation Monitoring and Reporting Plan is implemented (Appendix B). A significant effect is defined in the DEIR as a 10% reduction in groundwater flows to Little Lake. To avoid this significant effect, trigger levels throughout Rose Valley have been defined using the groundwater model discussed above.

Effects on Riparian and Groundwater Dependent Vegetation

Rose Valley groundwater dependent vegetation and riparian vegetation was inventoried in the DEIR on Pages 3.4-15 through 3.4-22. Adverse impacts to these areas are potential impacts from groundwater pumping. Biological reconnaissance surveys were performed to establish a baseline characterization of water dependent vegetation in areas of concern. These survey areas include Little Lake Ranch, Portuguese Bench, and Rose Spring. General habitat maps of groundwater dependent vegetation are shown in Figure 3.4-3 and Figure 3.4-4 in the DEIR.

The project has the potential to impact vegetation and sensitive plant communities in Rose Valley that are dependent on groundwater, including riparian vegetation. Wetlands and riparian vegetation at Little Lake Ranch could be impacted by capture of groundwater that supplies the surface water flows at the lake. Potentially significant impacts would not occur right away, but would evolve over time. Mitigation is closely tied to hydrologic monitoring. A monitoring program is proposed that includes trigger points for implementing mitigation to prevent significant effects to water levels and impacts to habitats at Little Lake (Appendix B). With implementation of mitigation, impacts to the habitat at Little Lake would be less than significant.

Artesian springs located at Portuguese Bench are not connected to the Rose Valley. The project would have no impacts on groundwater dependent vegetation at Portuguese Bench (DEIR, page 3.4-42).

Rose Spring, located approximately 2 miles north of the Hay Ranch property, is unlikely to be impacted by the proposed project because the water source for the spring is from precipitation in the Sierra Nevada and groundwater underflow from Owens Valley, and Rose Spring is substantially up-gradient from the project pumping. No impacts from the proposed project on groundwater dependent vegetation at Rose Spring are expected.

Effects on Rare or Endangered Plant and Animal Species

Special status plants and wildlife were inventoried in the project area and that information is displayed on pages 3.4-6 through 3.4-14 of the DEIR.

No plant species listed as threatened or endangered potentially occur on the project site. No plant species listed as threatened or endangered were identified within a 12-quadrangle search of the project area. Nine plants with California Native Plant Society listing have the potential to occur in the project area (DEIR, page 3.4-6).

Seven special status species were observed and another nine special status species, including the state threatened Mohave ground squirrel, are expected to occur in the project area. Only the desert tortoise and Mohave ground squirrel are federal and /or state-listed as threatened and receive legal protection. The other species are in decline and/or have a limited distribution and should be considered during the project planning. Potential special status wildlife species that could occur on the project site are included in Table 3.4-2 of the DEIR. The status, general distribution, known habitat preferences, and local occurrences within or near the project area are summarized in DEIR Appendix D for the 16 special status species that were observed or are expected to occur in the project area.

No direct potential effects to rare and endangered species are listed associated with the hydrologic impacts of the project.

Effects on Surface Water Features

Surface water features in Rose Valley were inventoried and are shown in Figure 3.2-1 in the DEIR. The principal surface water bodies in Rose Valley are South Haiwee Reservoir, several springs, and Little Lake and its associated springs, wetlands and ponds. Effects on springs and seeps are covered in a separate section, above.

South Haiwee Reservoir is the southernmost of two flow regulation reservoirs on the Los Angeles Aqueduct System in Owens Valley. South Haiwee Reservoir is located in the northern end of Rose Valley. Leakage from the reservoir and underflow from the Owens Valley contributes an estimated 788 acre-feet/year to the groundwater of the Rose Valley. There are no potential impacts to Haiwee Reservoir identified in the DEIR.

Little Lake is a man-made perennial lake (created in 1905) located at the southern end of the Rose Valley approximately 9 miles south of the Hay Ranch property (Figures 3.2-1 and 3.2-2 DEIR). Little Lake is located entirely within the Little Lake Ranch, which is a 1,200 acre privately owned recreational preserve owned and managed by Little Lake Ranch, Inc. Little Lake is approximately 90 acres in area and up to 5 feet deep. The outflow of Little Lake is controlled by a weir, which allows for the outflow level to be raised or lowered by the owners of Little Lake Ranch. To the south there are two perennial ponds P-1 and P-2 shown on Figure 3.2-2 on Page 3.2-7 of the DEIR. There are several other ponds that reportedly contain water intermittently, and adjacent wetland habitat. Depth of these ponds is variable and contingent on manipulation of surface water flows on the Little Lake Ranch property. Little Lake and the surrounding wetland areas and ponds are fed by groundwater seepage, a siphon well, springs on the ground surface that flow into the lake and ponds, and springs that are submerged in the lake. Groundwater at the north end of Little Lake is approximately 3 feet higher than the lake level and groundwater levels here remained above lake level throughout a 16 month period in 1996-1997. Based on this groundwater-lake level differential, the lake is gaining groundwater from the north. Upper Little Lake Pond (P-1) is fed by Coso Spring. Lower Little Lake Pond (P-2) is fed by a siphon well. The discharge from both ponds flows through an open channel to the south where it is used to fill additional ponds when the flow is adequate.

During the operation phase and post-operation recovery phase of the project, the principal potential impacts to surface water flows and Little Lake and associated ponds and wetlands include possible reduction or elimination of spring or well flows or reduction in groundwater seepage to the ponds and Little Lake. Pumping as proposed at Hay Ranch could result in reduction in the amount of groundwater flowing towards Little Lake from the north in Rose Valley. DEIR Table 3.2-6 shows that there would be significant reductions in evaporation from Little Lake if the project were to proceed for the full thirty years at the proposed pumping rate. The amount of groundwater surfacing on the property could be reduced substantially under the proposed pumping rates and project duration. Reducing groundwater flow rates through the lower part of the property would reduce the amount of water that Little Lake Ranch would have to implement their restoration efforts. It is important to note that even when pumping ceases for the project at the Hay Ranch Wells, drawdown effects would continue to propagate through the Rose Valley.

After consideration of all available data, a benchmark of no more than a 10% decrease in discharge to Little Lake has been determined to be the tolerance level in order to prevent significant impacts to the lake. This groundwater flow rate reduction trigger level has been set such that the observed variation in flow rates at Little Lake would remain largely within the natural variation already experienced on the property.

Maintenance of this 10% tolerance level will be accomplished through the Mitigation and Monitoring Program contained in Appendix B, which is based on the existing knowledge and its application in the current groundwater model. Details of this implementation are covered on pages 3.2-46 and 3.2-47 of the DEIR. Trigger levels in wells up-valley from Little Lake are set such that the 10% significance level is honored. Additional data collection and model calibration are part of the mitigation and monitoring program, and will refine the triggers and manage pumping during the operation of the project. No significant effects on surface water bodies in Rose Valley are expected if the Mitigation Monitoring and Reporting Plan is implemented.

Effects on Recharge to the Groundwater Basin and Potential for Overdraft

Recharge to the Rose Valley groundwater basin is estimated at approximately 4,979 acre-feet per year. Principal recharge components are Sierran mountain-front recharge (estimated at 4,191 acre-feet per year) and groundwater inflow from Owens Valley to the north and/or seepage from Haiwee Reservoir. Existing wells are estimated to extract 50 acre-feet per year from the Rose Valley Groundwater Basin. The proposed Coco Operating Company Hay Ranch Water Extraction and Delivery System Project would extract an additional 4,839 acre-feet at full discharge or 97% of the estimated annual recharge to the Rose Valley Groundwater Basin over the life of the project which is 30 years. The water budget figures in the DEIR are estimates with a considerable degree of uncertainty, therefore, because of the near equality of the proposed pumping and the average annual recharge, there is potential for overdraft if the project is operated at its full proposed duration and rate. In the future, two additional water transfer projects are anticipated. These are a LADWP Haiwee Seepage Loss Recovery Project (LADWP, 2007) at about 900 acre-feet per year and the proposed Deep Rose project of unknown amount. If these additional projects are implemented, there is greater potential for overdraft.

Effects on Storage Capacity of the Basin

The estimated storage capacity of the Rose Valley groundwater basin is 820,000 acre-feet (DWR, 1975). The 4,839 acre-foot yearly extraction for the Coso Project would be about 0.59 % of the estimated groundwater storage. Current total estimated yearly extraction in addition to the proposed project would be 0.60 % of the estimated groundwater storage. The project at full term at maximum pumping would pump a total of 145,170 acre-feet, which is 18 % of the estimated groundwater storage.

Potential for Subsidence

Subsidence related to groundwater withdrawal is typically related to basins containing extensive compressible clays. They Hay Ranch area is generally well consolidated, coarse alluvial and fluvial sediments with some lake clays. Subsidence potential in the project area is low due to the generally coarse-grained nature of the deposits.

Effects on Water Quality

Water quality of groundwater and surface water in the Rose Valley groundwater basin as well as the applicable section of the Coso Basin is included in the DEIR on Pages 3.2-19 through 3.2-30. Hay Ranch north well and South well water quality and primary and secondary drinking water standards are shown in Table 3.2-4 on page 3.2-25 of the DEIR. Hay Ranch well waters appear to be a more concentrated version of Haiwee Reservoir water. Rose Valley water hydrogeochemical data is displayed in table form in Appendix C3 of the DEIR.

In general, the chemistry of waters found in the Rose Valley watershed varies widely reflecting the multiple types of waters within the hydrological systems of semi-arid western US environments. The water chemistries are influenced by the interaction between groundwater and rock along the hydrological flow paths with the addition of a geothermal brine component. Recharge waters from drainage of the mountains surrounding Rose Valley have lower dissolved solids than the valley's groundwater, which is typically higher in dissolved solids reflecting longer transit times and a greater degree of water-rock interaction. Surface waters, impacted by evaporation, can be even higher in dissolved solids. Geothermal brines from the east in Coso Basin may also provide a component of flow to the Rose Valley Groundwater System. Waters grouped by chemistry type are listed on page 3.2-21 of the DEIR.

Substantial withdrawals of groundwater such as that defined by the Coso Project, could potentially cause changes in groundwater flow paths, such that the source of water at a particular well could be from a different area with a different water quality. However, given the scale of the area, it appears unlikely that changes in groundwater flow paths will be far-ranging enough to cause significant changes in the quality of groundwater. No significant impacts to surface water or groundwater quality are expected during construction or as a result of operation of the project.

Cummulative Effects of Anticipated Water Transfers

In the future, three additional groundwater projects are documented and anticipated. The location of these projects are shown in Figure 4.2-1 on Page 4-2 of the DEIR.

The South Haiwee Reservoir Leakage Recovery Project would pump 900 acre-feet/year of groundwater from an existing LADWP well (V816 or V817) through a 1,700-foot pipe line to the Los Angeles Aqueduct to the west.

The Crystal Geyser Bottling Plant project would involve the construction of a water bottling plant 3 miles south of Olancha. Approximately 106 acre-feet/year of groundwater would be pumped for the project. The project is located approximately 11 miles north of Hay Ranch.

The Deep Rose Geothermal project is a proposed exploratory drilling project that would involve the pumping of groundwater and an interbasin transfer of that water. The amount of water presently applied for is less than 50 acre-feet total. Any withdrawal from the Rose Valley would compound withdrawals associated with the proposed project. Groundwater drawdown from the Deep Rose project will be evaluated and mitigation would need to be implemented to prevent significant impacts to Little Lake.

Construction of the Crystal Geyser project is not expected to significantly impact Rose Valley groundwater resources because of the smaller rate of extraction proposed for the plant and the fact that the extraction would occur outside Rose Valley.

The South Haiwee Reservoir Leakage Recovery project would likely have cumulative impacts to Rose Valley groundwater resources. Analysis using the numerical model indicated that the Reservoir Leakage Recovery project would cause additional drawdown in Rose Valley, with the greatest increase of up to 10 feet in wells in the Dunmovin community at the north end of the valley and up to 0.5 feet at the south end of the valley near Little Lake, which would be a significant impact.

If the Reservoir Leakage Recovery project operates over the same time frame as the Hay Ranch project, then either a greater reduction in extraction rates would be necessary at Hay Ranch or a reduction in the amount of groundwater extracted for the Reservoir Leakage Recovery project would be needed to avoid incurring significant impacts at Little Lake. The reduction in allowable Hay Ranch extraction rates would amount to approximately the same 900 acre-ft per year contemplated for the Reservoir Leakage Recovery project. However, if the Reservoir Leakage Recovery project continues indefinitely, a greater reduction in Hay Ranch extraction rates, or a reduction in the Reservoir Leakage Recovery project extraction rates, would be needed to mitigate potential impacts to Little Lake. The amount of this additional reduction was not modeled because the time frame for monitoring and mitigation in that case extends well beyond the proposed time frame for the Hay Ranch project. Since the Reservoir Leakage project is only conceptual at this time (i.e. an application has not yet been filed with Inyo County), and mitigation on the Hay Ranch project likely shortens the period of time that the project can operate, these projects may not be concurrent.

Project Conditions, Monitoring and Groundwater Management and Reporting

The Mitigation Monitoring and Reporting Program (MMRP) contained in Appendix B of this staff report describes the mitigation measures and provides a framework for monitoring to verify that mitigation measures are executed as specified in the FEIR. In addition, the MMRP (Appendix B) complies with the monitoring, groundwater management and reporting requirements of the Inyo County Groundwater Ordinance.

The MMRP includes tables to facilitate the implementation of all mitigation defined in the FEIR. All non-hydrology mitigation measures are presented in tables in Chapter 2 of this MMRP. The four hydrology mitigation measures are found in Chapter 3 of the MMRP, the Hydrologic Monitoring and Mitigation Plan (See Appendix B).

Inyo County Water Department Recommendations to the Inyo County Water Commission

1. The Inyo County Water Department recommends that the Inyo County Water Commission recommend to the Inyo County Planning Commission the MMRP in Appendix B of this report for adoption as the project conditions, monitoring and groundwater management and reporting required by the Inyo County Groundwater Ordinance.

2. The Inyo County Water Department recommends that the Inyo Count Water Commission make a recommendation to the Inyo County Planning Commission, conditioned on the recommendation above, that the proposed water transfer in the Coso Operating company Hay Ranch Water Extraction and Delivery System Conditional Use Permit (CUP 2007-003) Application be granted with a finding that the project will not unreasonably affect the environment of Inyo County.

References

DWR, 1975, California's Ground Water. Department of Water Resources Bulletin No. 118.

MHA, July, 2008, Draft EIR. Coso Operating Company Hay Ranch Water Extraction and Delivery System. Conditional Use Permit (CUP 2007-003) Application SCH# 2007101002

MHA, December, 2008, Final EIR. Coso Operating Company Hay Ranch Water Extraction and Delivery System. Conditional Use Permit (CUP 2007-003) Application SCH# 2007101002.